

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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UNITED STATES OF AMERICA,  
*Plaintiff,*

v.

[1] JUAN GABRIEL RIVERA-SURITA,  
a/k/a "Gaby",  
(Counts ONE through FIVE)  
[2] NELSON ENRIQUE ARAGONEZ-  
NAZARIO,  
(Counts ONE through FIVE)  
[3] RAFAEL IRIZARRY-SANTIAGO,  
a/k/a "Rafy",  
(Counts ONE through FOUR)  
[4] ANTONIO FERRER-PABON, a/k/a  
"Pingu",  
(Counts ONE through FIVE)  
[5] SANTOS DELGADO-COLON,  
a/k/a "Santitos", "El Cojo",  
(Counts ONE through FIVE)  
[6] ERIC JOEL ORTIZ-RIBOT, a/k/a  
"Joito",  
(Counts ONE through FOUR)  
[7] BRYAN LEE RODRIGUEZ-  
MERCADO, a/k/a "Brallitan",  
(Counts ONE through FIVE)  
[8] ALEXANDER OLIVO-FRANQUI",  
a/k/a "El Menor",  
(Counts ONE through FIVE)  
[9] JEAN PAUL LAMBOY-PALERMO,  
a/k/a "Jampi",  
(Counts ONE through FIVE)  
[10] JOSE ENRIQUE RIVERA-  
NEGRON, a/k/a "Joito",  
(Counts ONE through FOUR)  
[11] KYFRAN JANIELL CASIANO-  
JORGE,  
(Counts ONE through FOUR)  
[12] JAYSON RAMOS-JORGE,

INDICTMENT

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FILED UNDER SEAL

CRIMINAL NO. 22- 138(PAD)

**Violations:**

**(COUNT ONE)**

21 U.S.C. §§ 841(a)(1), 846, and 860.

**(COUNT TWO)**

21 U.S.C. §§ 841(a)(1), 860 and 18 U.S.C.  
§2.

**(COUNT THREE)**

21 U.S.C. §§ 841(a)(1), 860 and 18 U.S.C.  
§2.

**(COUNT FOUR)**

21 U.S.C. §§ 841(a)(1), 860 and 18 U.S.C.  
§2.

**(COUNT FIVE)**

18 U.S.C. § 924(c).

**Forfeiture Allegation**

Title 18, *United States Code*, §982

Title 21, *United States Code*, § 853 and Rule  
32.2(a) F.R.C.P.

Title 28, *United States Code*, §2461(c)

**(FIVE COUNTS)**

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**a/k/a “Bibi”**

(Counts ONE through FIVE)

**[13] JENNIFER VILLANUEVA-PEREZ,**

**a/k/a “La Flaca”,**

(Counts ONE through FIVE)

**[14] OSCAR ANDRES VELEZ-MATOS,**

(Counts ONE through FOUR)

**[15] RAFAEL MANUEL IRIZARRY-**

**VELEZ, a/k/a “Pucho”,**

(Counts ONE through FOUR)

**[16] EDIAN PALERMO-BAREA,**

(Counts ONE through FOUR)

**[17] BRENDA L. RODRIGUEZ-**

**ROSADO,**

(Counts ONE through FOUR)

**[18] ROBERTO L. LAMBERTY, a/k/a,**

**“Sierra Linda”,**

(Counts ONE through FOUR)

**[19] KIFRAN ADRIAN CASIANO-**

**ALAYON,**

(Counts ONE through FOUR)

**[20] ALEX ARAGONES, a/k/a**

**“Nono”,**

(Counts ONE through FOUR)

*Defendants.*

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**(Conspiracy to Possess with Intent to Distribute Controlled Substances)**

From a date unknown during the year 2015 and continuing up to and including 2019, in the Municipality of Cabo Rojo, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

**[1] JUAN GABRIEL RIVERA-SURITA, a/k/a “Gaby”,**

**[2] NELSON ENRIQUE ARAGONEZ-NAZARIO,**

**[3] RAFAEL IRIZARRY-SANTIAGO, a/k/a “Rafy”,**

**[4] ANTONIO FERRER-PABON, a/k/a “Pinguí”,**

**[5] SANTOS DELGADO-COLON, a/k/a “Santitos”, “El Cojo”,**

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- [6] ERIC JOEL ORTIZ-RIBOT, a/k/a “Joito”,
- [7] BRYAN LEE RODRIGUEZ-MERCADO, aka “Brallitan”,
- [8] ALEXANDER OLIVO-FRANQUI, a/k/a “El Menor”,
- [9] JEAN PAUL LAMBOY-PALERMO, a/k/a “Jampi”,
- [10] JOSE ENRIQUE RIVERA-NEGRON, a/k/a “Joito”,
- [11] KYFRAN JANIELL CASIANO-JORGE,
- [12] JAYSON RAMOS-JORGE, a/k/a “Bibi”
- [13] JENNIFER VILLANUEVA-PEREZ, a/k/a “La Flaca”,
- [14] OSCAR ANDRES VELEZ-MATOS,
- [15] RAFAEL MANUEL IRIZARRY-VELEZ, a/k/a “Pucho”,
- [16] EDIAN PALERMO-BAREA,
- [17] BRENDA L. RODRIGUEZ-ROSADO,
- [18] ROBERTO L. LAMBERTY, a/k/a, “Sierra Linda”,
- [19] KIFRAN ADRIAN CASIANO-ALAYON,
- [20] ALEX ARAGONES, a/k/a “Nono”,

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and/or to distribute controlled substances, to wit: in excess of two hundred and eighty (280) grams of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; in excess of five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; in excess of one hundred (100) kilograms of a mixture or substance containing a detectable amount of marijuana, a Schedule I, Controlled Substance; and a mixture or substance containing a detectable amount of Oxycodone (commonly known as Percocet), a scheduled II Controlled Substance within one thousand (1,000) feet of a real property comprising the Santa Rita de Casia Public

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Housing Project, a housing facility owned by a public housing authority and other areas nearby. All in violation of Title 21, *United States Code*, Sections 841(a)(1), 846 and 860.

**OBJECT OF THE CONSPIRACY**

The object of the conspiracy was the large-scale distribution of controlled substances at the Santa Rita de Casia Public Housing Project, and other areas nearby the municipality of Cabo Rojo, Puerto Rico. All for significant financial gain and profit.

**MANNER AND MEANS OF THE CONSPIRACY**

The manner and means by which the defendants and co-conspirators would accomplish and further the object of the conspiracy, among others, included the following:

1. It was part of the manner and means of the conspiracy that the members of the organization named themselves the wolves and would display hand signs to identify themselves as such. Some members of the organization would tattoo wolf designs on their bodies such as the paw print of a wolf to identify themselves as members of the drug trafficking organization.

2. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would establish a drug distribution point that would move within different areas inside the public housing project and nearby areas to avoid police detection.

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3. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would sell street quantities amounts of cocaine base (“crack”), cocaine, marijuana at the drug distribution points.

4. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would weigh, “cut”, divide, and package the cocaine, crack and marijuana in distinctive “baggies” and/or “vials” in order to keep track of their narcotics.

5. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would routinely possess, carry, brandish, and use or discharge firearms to protect themselves and their drug trafficking organization.

6. It was further part of the manner and means of the conspiracy members of the conspiracy, on request, would do delivery of drugs to different locations within the municipality of Cabo Rojo.

7. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would use force, violence and intimidation against rival drug trafficking gangs. Members of the drug trafficking organization would also use violence to discipline members of their own drug trafficking organization and other individuals at the drug point.

8. It was further part of the manner and means of the conspiracy that some of the co-defendants and their co-conspirators would act in different roles in order to further the goals of the conspiracy, to wit: leaders, enforcers, runners, sellers, and

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facilitators.

9. It was further part of the manner and means of the conspiracy that the leaders would maintain a group of co-defendants administrating the daily activities of the drug distribution point.

10. It was further part of the manner and means of the conspiracy that some members of the organization, in order to intimidate rival gang members and/or other individuals at the drug point, would burn the vehicles in their possession.

**ROLES OF THE MEMBERS OF THE CONSPIRACY**

Leaders directly controlled and supervised the drug trafficking activities at the drug points located within the Santa Rita de Casia Public Housing Project and other areas nearby the Municipality of Cabo Rojo.

Enforcers did possess, carry, brandish, use and discharge firearms to protect the leaders and members of the drug trafficking organization, the narcotics, the proceeds derived from their sales, and to further accomplish the goals of the conspiracy. Enforcers often acted upon instructions given by the leaders of this organization. Enforcers would often provide protection to the drug trafficking organization's drug distribution points.

The runners worked under the direct supervision of the leaders of the drug trafficking organization. They were responsible for providing sufficient narcotics to the sellers for further distribution at the drug point. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also



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supervise and make sure that there were street sellers at the drug point. They would prepare ledgers to maintain accountability of the sales of the narcotics sold at the drug point. The runners had a supervisory role within the conspiracy, as they would directly supervise on a daily basis, the activities of multiple sellers, and the daily activities of the drug points.

The sellers would distribute street quantity amounts of crack cocaine, cocaine, and marijuana. As sellers, they were accountable for the drug proceeds and the narcotics sold at the drug distribution points.

All in violation of Title 21, *United States Code*, Sections 841(a)(1), 846 and 860.

**COUNT TWO**

**Possession with Intent to Distribute/Distribution of Cocaine Base**

From a date unknown during the year 2015 and continuing up to and including 2019, in the Municipality of Cabo Rojo, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court

- [1] JUAN GABRIEL RIVERA-SURITA, a/k/a "Gaby",
- [2] NELSON ENRIQUE ARAGONEZ-NAZARIO,
- [3] RAFAEL IRIZARRY-SANTIAGO, a/k/a "Rafy",
- [4] ANTONIO FERRER-PABON, a/k/a "Pingu",
- [5] SANTOS DELGADO-COLON, a/k/a "Santitos", "El Cojo",
- [6] ERIC JOEL ORTIZ-RIBOT, a/k/a "Joito",
- [7] BRYAN LEE RODRIGUEZ-MERCADO, aka "Brallitan",
- [8] ALEXANDER OLIVO-FRANQUI, a/k/a "El Menor",
- [9] JEAN PAUL LAMBOY-PALERMO, a/k/a "Jampi",
- [10] JOSE ENRIQUE RIVERA-NEGRON, a/k/a "Joito",
- [11] KYFRAN JANIELL CASIANO-JORGE,
- [12] JAYSON RAMOS-JORGE, a/k/a "Bibi"
- [13] JENNIFER VILLANUEVA-PEREZ, a/k/a "La Flaca",

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[14] OSCAR ANDRES VELEZ-MATOS,  
[15] RAFAEL MANUEL IRIZARRY-VELEZ, a/k/a “Pucho”,  
[16] EDIAN PALERMO-BAREA,  
[17] BRENDA L. RODRIGUEZ-ROSADO,  
[18] ROBERTO L. LAMBERTY, a/k/a, “Sierra Linda”,  
[19] KIFRAN ADRIAN CASIANO-ALAYON,  
[20] ALEX ARAGONES, a/k/a “Nono”,

the defendants herein, aiding and abetting one another, did knowingly and intentionally possess with intent to distribute two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (Crack), a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of a real property comprising, the Santa Rita de Casia Public Housing Project, a housing facility owned by a public housing authority and other areas nearby. All in violation of Title 21, *United States Code*, Sections 841(a)(1), 860 and Title 18, *United States Code*, Section 2.

**COUNT THREE**

**Possession with Intent to Distribute/Distribution of Cocaine**

From a date unknown during the year 2015 and continuing up to and including 2019, in the Municipality of Cabo Rojo, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court

[1] JUAN GABRIEL RIVERA-SURITA, a/k/a “Gaby”,  
[2] NELSON ENRIQUE ARAGONEZ-NAZARIO,  
[3] RAFAEL IRIZARRY-SANTIAGO, a/k/a “Rafy”,  
[4] ANTONIO FERRER-PABON, a/k/a “Pinguí”,  
[5] SANTOS DELGADO-COLON, a/k/a “Santitos”, “El Cojo”,  
[6] ERIC JOEL ORTIZ-RIBOT, a/k/a “Joito”,  
[7] BRYAN LEE RODRIGUEZ-MERCADO, aka “Brallitan”,



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[8] ALEXANDER OLIVO-FRANQUI", a/k/a "El Menor",  
[9] JEAN PAUL LAMBOY-PALERMO, a/k/a "Jampi",  
[10] JOSE ENRIQUE RIVERA-NEGRON, a/k/a "Joito",  
[11] KYFRAN JANIELL CASIANO-JORGE,  
[12] JAYSON RAMOS-JORGE, a/k/a "Bibi"  
[13] JENNIFER VILLANUEVA-PEREZ, a/k/a "La Flaca",  
[14] OSCAR ANDRES VELEZ-MATOS,  
[15] RAFAEL MANUEL IRIZARRY-VELEZ, a/k/a "Pucho",  
[16] EDIAN PALERMO-BAREA,  
[17] BRENDA L. RODRIGUEZ-ROSADO,  
[18] ROBERTO L. LAMBERTY, a/k/a, "Sierra Linda",  
[19] KIFRAN ADRIAN CASIANO-ALAYON,  
[20] ALEX ARAGONES, a/k/a "Nono",

the defendants herein, aiding and abetting one another, did knowingly and intentionally possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of a real property comprising the Santa Rita de Casia Public Housing Project, a housing facility owned by a public housing authority and other areas nearby. All in violation of Title 21, *United States Code*, Sections 841(a)(1), 860 and Title 18, *United States Code*, Section 2.

**COUNT FOUR**

**Possession with Intent to Distribute/Distribution of Marijuana**

From a date unknown during the year 2015 and continuing up to and including 2019, in the Municipality of Cabo Rojo, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

[1] JUAN GABRIEL RIVERA-SURITA, a/k/a "Gaby",  
[2] NELSON ENRIQUE ARAGONEZ-NAZARIO,  
[3] RAFAEL IRIZARRY-SANTIAGO, a/k/a "Rafy",  
[4] ANTONIO FERRER-PABON, a/k/a "Pingu",  
[5] SANTOS DELGADO-COLON, a/k/a "Santitos", "El Cojo",

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- [6] ERIC JOEL ORTIZ-RIBOT, a/k/a “Joito”,
- [7] BRYAN LEE RODRIGUEZ-MERCADO, aka “Brallitan”,
- [8] ALEXANDER OLIVO-FRANQUI, a/k/a “El Menor”,
- [9] JEAN PAUL LAMBOY-PALERMO, a/k/a “Jampi”,
- [10] JOSE ENRIQUE RIVERA-NEGRON, a/k/a “Joito”,
- [11] KYFRAN JANIELL CASIANO-JORGE,
- [12] JAYSON RAMOS-JORGE, a/k/a “Bibi”
- [13] JENNIFER VILLANUEVA-PEREZ, a/k/a “La Flaca”,
- [14] OSCAR ANDRES VELEZ-MATOS,
- [15] RAFAEL MANUEL IRIZARRY-VELEZ, a/k/a “Pucho”,
- [16] EDIAN PALERMO-BAREA,
- [17] BRENDA L. RODRIGUEZ-ROSADO,
- [18] ROBERTO L. LAMBERTY, a/k/a, “Sierra Linda”,
- [19] KIFRAN ADRIAN CASIANO-ALAYON,
- [20] ALEX ARAGONES, a/k/a “Nono”,

the defendants herein, aiding and abetting one another, did knowingly and intentionally possess with intent to distribute one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of a real property comprising the Santa Rita de Casia Public Housing Project, a housing facility owned by a public housing authority and other areas nearby. All in violation of Title 21, *United States Code*, Sections 841(a)(1), 860 and Title 18, *United States Code*, Section 2.

**COUNT FIVE**

**Possession of Firearms in Furtherance of a Drug Trafficking Crime**

From a date unknown during the year 2015 and continuing up to and including 2019, in the Municipality of Cabo Rojo, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

- [1] JUAN GABRIEL RIVERA-SURITA, a/k/a “Gaby”,
- [2] NELSON ENRIQUE ARAGONEZ-NAZARIO,

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[4] ANTONIO FERRER-PABON, a/k/a “Pinguí”,  
[5] SANTOS DELGADO-COLON, a/k/a “Santitos”, “El Cojo”,  
[7] BRYAN LEE RODRIGUEZ-MERCADO, aka “Brallitan,  
[8] ALEXANDER OLIVO-FRANQUI”, a/k/a “El Menor”,  
[9] JEAN PAUL LAMBOY-PALERMO, a/k/a “Jampi”,  
[12] JAYSON RAMOS-JORGE, a/k/a “Bibi”,  
[13] JENNIFER VILLANUEVA-PEREZ, a/k/a “La Flaca”,

the defendants herein, did knowingly and unlawfully possess firearms, of unknown make and caliber, as that term is defined in Title 18, *United States Code*, Section 921(a)(3), in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, that is possession with intent to distribute controlled substances. As charged in Count One of this Indictment, pursuant to Title 21, *United States Code*, Section 841(a)(1). All in violation of Title 18, *United States Code*, Section 924(c)(1)(A).

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**NARCOTICS FORFEITURE ALLEGATION**

The allegations contained in Counts ONE to FOUR of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, *United States Code*, Section 853.

Pursuant to Title 21, *United States Code*, Section 853, upon conviction of the offense in violation of Title 21, *United States Code*, Sections 841 and 846, set forth in Count ONE through FOUR of this Indictment, the defendants, shall forfeit to the United States, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense. The property to be forfeited includes, but is not limited to, the following: \$ 21,024,000.00

If any of the property described above, as a result of any act or omission of the defendants:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

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the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21 *United States Code*, Section 853(p).

**FIREARMS FORFEITURE ALLEGATION**

The allegations contained in Count Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, *United States Code*, Section 924(d) and Title 28, *United States Code*, Section 2461(c). Upon conviction of either of the offense in violation of Title 18, *United States Code*, Section 924(c) as set forth in Count Five of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, *United States Code*, Section 924(d) and Title 28, *United States Code*, Section 2461(c), any firearms and ammunition involved or used in the commission of the offense.

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All pursuant to Title 18, *United States Code*, Section 924(d) and Title 28, *United States Code*, Section 2461(c).

TRUE BILL

**FOREPERSON**

Date: March 31, 2022

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